



Testimony of
The Alliance of Automobile Manufacturers

Submitted to
The Joint Committee on Public Health

Regarding
Senate Bill 274

March 7, 2012

On behalf of the Alliance of Automobile Manufacturers, thank you for the opportunity to comment on Senate Bill 274. The Alliance is a trade association of twelve passenger car and light truck manufacturers including BMW Group, Chrysler Group LLC, Ford Motor Company, General Motors Company, Jaguar Land Rover, Mazda, Mercedes-Benz USA, Mitsubishi Motors, Porsche, Toyota, Volkswagen, and Volvo.

Senate Bill 274 establishes a process by which the Commissioner of Public Health, in consultation with the Commissioner of Energy and Environmental Protection and the Green Ribbon Science Panel, identifies priority chemicals of high concern to children and reports back to the General Assembly with recommendations on how to address the use of these chemicals in children's products.

While the definition of "children's product" is specific to those marketed for use by children under twelve years of age, the Alliance strongly recommends providing an explicit exemption for motor vehicles and component parts within the definition. This explicit exemption provides surety that automobiles are not captured inadvertently within the definition, particularly since the phrase "car seats" is not defined. This exemption is commonly seen in other states proposing legislation specific to children's products.

Furthermore, automobiles are the most widely recycled consumer product today with over 95% of autos processed for recycling each year. Automobiles are not haphazardly disposed of back into the environment. More than 85% of every car is reused or recycled as part of the independent auto-recycling industry which generates \$22 billion in annual sales.

The Alliance respectfully recommends the following amendment to address the concerns outlined above:

(2) "Children's product" means a consumer product intended for, made for or marketed for use by children under twelve years of age. Children's product includes baby products, toys, car seats, personal care products and clothing, and any consumer product containing a chemical of high concern that when used or disposed of will likely result in a child under twelve years of age

or a fetus being exposed to that chemical. "Children's Product" does not include over-the-counter drugs, prescription drugs, food, dietary supplements, packaging, medical devices, motor vehicles and component parts, and products that are both a cosmetic and a drug regulated by the federal Food and Drug Administration. A product label that includes usage instructions for a product that applies to children does not in and of itself establish that the product is a children's product;

For additional information, please contact Laura Dooley at the Alliance of Automobile Manufacturers.

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